

Attachment 12

**IN THE UNITED STATES DISTRICT COURT FOR THE
NORTHERN DISTRICT OF OKLAHOMA**

PETER POE, et al.,

Plaintiffs,

v.

GENTNER DRUMMOND, et al.,

Defendants.

Case No. 23-cv-00177-JFH-SH

**DECLARATION OF LAUREN LOE IN SUPPORT OF
PLAINTIFFS' MOTION FOR PRELIMINARY INJUNCTION**

I, Lauren Loe, pursuant to 28 U.S.C. §1746, declare as follows:

1. My name for the purposes of the above-captioned action is Lauren Loe, a pseudonym.¹ I am a Plaintiff in this action. I offer this Declaration in support of Plaintiffs' Motion for Preliminary Injunction. I am over the age of 18, of sound mind, have personal knowledge of the facts set forth in this Declaration, and could and would competently testify to those facts if called as a witness.

2. I am the legal guardian and next of friend of my daughter, Lydia Loe, who I began fostering and then adopted when she was 13 years old.

¹ Lauren Loe and Lydia Loe are pseudonyms. My daughter (who is a minor) and I are proceeding under pseudonyms to protect our right to privacy and ourselves from discrimination, harassment, and violence, as well as retaliation for seeking to protect our rights.

3. We live in Cleveland County, Oklahoma.

4. Lydia is now 16 years old and a sophomore in high school.

5. Lydia has a strong sense of self and good sense of humor. She is witty, creative, and cares deeply for her family and close group of supportive friends.

6. Lydia is transgender. She was designated male at birth on her birth certificate, but she is a girl.

7. When Lydia first came to live with me, she was already wearing very feminine clothing and expressed interest in growing her hair long. I adopted Lydia, and about a year after she came to live with me, she told me she is transgender.

8. During the COVID-19 shutdown, I homeschooled Lydia, and she used the time at home in a supportive environment to experiment with different feminine hairstyles, makeup, and girl's clothing. She would regularly create vibrant, beautiful makeup looks on herself and sometimes on me. She tested out acting more feminine around me and expressed that she liked "girly" things. For example, we watched a lot of movies together during the lockdown, and one that Lydia loved to watch again and again was The Little Mermaid. During the movie, she told me she wanted to find a sea witch and wake up in a girl's body, just like Ariel. Lydia's mood improved with the space to be herself, but, even when things started to open back up, Lydia rarely left the house.

9. In 2020, I took her a doctor at OU Health and a counselor. After about eight months of counseling, we had another appointment at OU Health and talked to Lydia's doctor about the possibility of starting estrogen. She gave us a lot of information to look over and went over the risks and benefits of hormone therapy.

10. Lydia was diagnosed with gender dysphoria. Several months later, we had a follow up with her doctor who went through the informed consent process for starting estrogen with us and ran blood tests.

11. After two years of counseling, regular checkups at OU Health, and much consideration, we decided that estrogen was the right choice for Lydia. She was prescribed estradiol and spironolactone.

12. When Senate Bill 3 went into effect, Lydia could no longer access care at OU Health and had to begin receiving her hormone treatment from Diversity Family Health Clinic.

13. After hormone treatment, Lydia acts more like herself. She speaks and laughs more, and her mood has drastically improved. The difference in her mental health is night and day, and she seems more comfortable in who she is and what she looks like. It was like she laid down a giant weight that she was dragging and can now do things like everyone else. She spends more time outside of her room, leaves the house more often, and spends more time with her family and friends. She is more talkative and happier around our extended family members. Before starting estrogen, Lydia would take breaks from spending time with family to sit in another room or ask to leave family events early because it was stressful being around people who did not know the real her – who did not know she is a girl. She does not spend so much time and energy hating herself or her body, which has allowed her to be more expressive, to connect with others, and blossom as the girl she is.

14. I closely followed the Oklahoma State Legislature this year, as many politicians debated whether we would continue to have access to hormone treatment for Lydia. I do not understand why politicians think they understand my daughter better than I do or her medical needs better than her doctors and mental health providers.

15. I am very concerned about Lydia's mental and physical health if she is forced to stop taking estrogen and other the medical treatment recommended to us. Lydia has struggled with depression, suicidal thoughts, and self-harm. Since receiving therapy and estrogen, her mental health has dramatically improved, and she has not had an incident of self-harm since starting estrogen. Now, Lydia talks about traveling and where she wants to live when she grows up. Before taking estrogen, she would never talk about the future because she did not believe she would have one. Lydia's mental health declined drastically when there was a ten-day gap in access to her estrogen while we were switching from OU Health to the Diversity Family Health Clinic because of SB 3. It was the worst I had ever seen her mental health – she could barely talk, eat, or do anything. I was terrified for her. I worry about her risk of suicidality and self-harm if she cannot access hormone therapy.

16. It breaks my heart that Lydia, who is just now growing in her confidence and self-worth, may lose access to the treatment that has helped her so much. I am proud of her for her strength and resilience, but I wish she could just focus on the struggles of being a teenager rather than worrying about how she can keep taking the medicine she needs.

17. I do not want to move my family out of state. My family has lived in Oklahoma for generations. My parents and sister live nearby and are an active part of my and Lydia's life. We have a strong support network here, and I cannot imagine living anywhere else. Moving out of state would uproot everything we know and have built together.

I declare under penalty of perjury that the foregoing is true and correct.

Executed in Cleveland County, Oklahoma on this 1st day of May, 2023.

Lauren Loe

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